

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

2004 DEC -3 A 10: 54

U.S. DISTRICT COURT
DISTRICT OF MASS.

Plaintiff A, Plaintiff B,
Plaintiff C, PLAINTIFF D and
Others Similarly Situated,
Plaintiffs

v.

WANG, Taihua, Communist Party
Secretary of Anhui Province, and
formerly Governor of Anhui Province
of the People's Republic of China

No. 04CV11022 EFH

APPLICATION TO CLERK FOR ENTRY OF DEFAULT

To the Clerk of the United States District Court for the Eastern
District of Massachusetts:

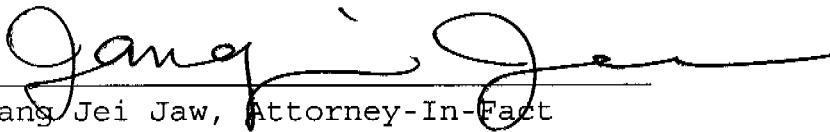
Plaintiff A, B, C and D hereby requests that the Clerk enter
the default of defendant Wang, Taihua for failure to plead or
otherwise defend in a timely manner as provided by Federal Rules
of Civil Procedure, Rule 55(a).

This request is based on the attached affirmation of Jang
Jei Jaw, Attorney-in-Fact which shows the following:

- (1) The defendant was served with the summons and complaint
pursuant to Federal Rules of Civil Procedure, Rule 4(c) on
May 24, 2004, as evidenced by the proof of service on file
with this court, a copy of which is attached to this
application.

- (2) The defendant has failed to plead or otherwise respond to the complaint.
- (3) The applicable time limit for responding has expired.
- (4) A copy of the application has been sent to the defendant on day of November, 2004.

Executed this 24th day of November, 2004, in Lexington, MA.

A handwritten signature in black ink, appearing to read 'Jang Jei Jaw', written over a horizontal line.

Jang Jei Jaw, Attorney-In-Fact
16 Flintlock Road
Lexington, MA 02420
USA